

CLEMENT SETH ROBERTS (SBN 209203)  
croberts@orrick.com  
BAS DE BLANK (SBN 191487)  
basdeblank@orrick.com  
ALYSSA CARIDIS (SBN 260103)  
acaridis@orrick.com  
ORRICK, HERRINGTON & SUTCLIFFE LLP  
The Orrick Building  
405 Howard Street  
San Francisco, CA 94105-2669  
Telephone: +1 415 773 5700  
Facsimile: +1 415 773 5759

SEAN M. SULLIVAN (*pro hac vice*)  
sullivan@ls3ip.com  
COLE RICHTER (*pro hac vice*)  
richter@ls3ip.com  
LEE SULLIVAN SHEA & SMITH LLP  
656 W Randolph St., Floor 5W  
Chicago, IL 60661  
Telephone: +1 312 754 0002  
Facsimile: +1 312 754 0003

*Attorneys for Sonos, Inc.*

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA,  
SAN FRANCISCO DIVISION

GOOGLE LLC,  
Plaintiff and Counter-defendant,  
v.  
SONOS, INC.,  
Defendant and Counter-claimant.

Case No. 3:20-cv-06754-WHA  
Related to Case No. 3:21-cv-07559-WHA

**SONOS, INC.'S ADMINISTRATIVE  
MOTION TO CONSIDER WHETHER  
ANOTHER PARTY'S MATERIAL  
SHOULD BE SEALED RE MOTION TO  
STRIKE**

## I. INTRODUCTION

Pursuant to Civil Local Rule 79-5(f), Sonos, Inc. (“Sonos”) hereby respectfully submits this Administrative Motion to Consider Whether Another Party’s Material Should Be Sealed (“Administrative Motion”) in connection with Sonos’s Motion to Strike Portions of Google’s Expert Invalidity and Noninfringement Reports (“Sonos’s Motion”). Specifically, Sonos seeks to file under seal the information and/or document(s) listed below:

DOCUMENT	PORTIONS TO BE SEALED	DESIGNATING PARTY
Sonos’s Motion	Portions highlighted in blue and outlined in red boxes	Google
Exhibit A to Sonos’s Motion	Entire Document	Google
Exhibit B to Sonos’s Motion	Entire Document	Google
Exhibit C to Sonos’s Motion	Entire Document	Google
Exhibit E to Sonos’s Motion	Portions outlined in red boxes	Google
Exhibit I to Sonos’s Motion	Entire Document	Google
Exhibit J to Sonos’s Motion	Portions outlined in red boxes	Google and Sonos <sup>1</sup>
Exhibit J to Sonos’s Motion	Remainder of document	Google
Exhibit K to Sonos’s Motion	Entire Document	Google
Exhibit L to Sonos’s Motion	Entire Document	Google
Exhibit U to Sonos’s Motion	Entire Document	Google
Exhibit V to Sonos’s Motion	Entire Document	Google
Exhibit W to Sonos’s Motion	Entire Document	Google
Exhibit X to Sonos’s Motion	Entire Document	Google

<sup>1</sup> With respect to the portions of Exhibit J outlined in red boxes, which contain confidential material designated by both parties, Sonos is concurrently filing an administrative motion to seal the same information on its *own* behalf.

1 **II. LEGAL STANDARD**

2 Materials and documents may be provisionally filed under seal pursuant to Civil Local  
3 Rule 79-5(f) when the document, or portions thereof, “has been designated as confidential by  
4 another party or non-party.” *See* L.R. 79-5(f).

5 **III. GOOGLE LLC’S CONFIDENTIAL INFORMATION**

6 Sonos seeks to seal the information and/or document(s) listed in the above table because  
7 they may contain information that Google considers Confidential and/or Highly Confidential-  
8 Attorneys’ Eyes Only and/or Highly Confidential-Source Code pursuant to the Protective Order  
9 entered by this Court. Dkt. 92. Except as noted in note 1, above, Sonos takes no position on the  
10 merits of sealing Google’s designated material, and expects Google to file one or more  
11 declarations in accordance with the Local Rules.

12 **IV. CONCLUSION**

13 In compliance with Civil Local Rule 79-5(d) and (e), unredacted versions of the above-  
14 listed documents accompany this Administrative Motion and redacted versions are filed publicly.  
15 A proposed order is being filed concurrently herewith. For the foregoing reasons, Sonos  
16 respectfully requests that the Court grant Sonos’s Administrative Motion.

17 Dated: January 27, 2023

ORRICK HERRINGTON & SUTCLIFFE LLP  
and  
LEE SULLIVAN SHEA & SMITH LLP

By: /s/ Clement S. Roberts  
Clement S. Roberts

*Attorneys for Sonos, Inc.*